

### **REMARKS**

This amendment is responsive to the Non-Final Office Action mailed on August 14, 2008. Claims 1-7 and 28-31 stand rejected. Claim 1 has been amended. In view of the following remarks, Applicant respectfully submits that this application is in complete condition for allowance and requests reconsideration of the application in this regard.

### **Rejections under 35 U.S.C. § 103**

The Examiner has rejected claims 1-7 and 28-31 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,944,620 to Cleraux et al. (*Cleraux*). Of these claims, claim 1 is the independent claim.

*Cleraux* is directed to a method for supporting multiple file system types in a single mass storage device, where the system hosting the mass storage is able to access the files in each of the file system types. *Cleraux* uses the alternate, hosted, file systems for devices that do not have mass storage devices of their own, but rather use the host system mass storage device as their file system. The other devices may use an alternate operating system, and therefore an alternate file system type than the host. Any features of the file systems for the other devices that are unsupported on the host file system are written to and accessed through an emulation library allowing that the file or feature be emulated and accessed by the host system.

Applicant has amended claim 1 to recite “storing in the data structure a first anchor point for the object that references the first directory, said first directory implemented on a first filesystem type” and “storing in the data structure a second anchor point for the object that references the second directory, said second directory implemented on a second filesystem type different than the first.” This amendment to claim 1 further clarifies Applicant’s invention, namely that the first and second anchor points are anchor points to parent directories implemented on different filesystem types for the same object. *Cleraux* fails to disclose an object having a first anchor point referencing a first directory on a first filesystem type and a second anchor point referencing a second directory on a second filesystem type different than the first. Rather *Cleraux* discloses an object on a filesystem hosted on a mass storage device connected to a host system. The object is accessed by both the device without a mass storage device of its own, using the hosted filesystem, and accessed by the host system having the mass

storage device. The host system accesses objects on the hosted filesystem through an emulation library if the hosted filesystem type is of a different type than that of the host system. Neither the filesystem for the host system, nor the filesystem for the device without a mass storage device, have an object with two anchor points to two corresponding directories, each implemented on different file system types. Furthermore, neither *Cleraux* nor the Examiner provide any suggestion or rational reason as to why the host system or the other device that does not have a file system of its own would have a need for a data structure where an object has an anchor point referencing a first directory in a first filesystem type and a second anchor point referencing a second directory in a second filesystem type different from the first.

Therefore, Applicant submits that *Cleraux* fails to disclose or suggest “storing in the data structure a first anchor point for the object that references the first directory, said first directory implemented on a first filesystem type” and “storing in the data structure a second anchor point for the object that references the second directory, said second directory implemented on a second filesystem type different than the first” as recited in Applicant’s amended claim 1. Consequently, amended independent claim 1 is patentable over *Cleraux* and Applicant respectfully requests that the rejection for claim 1 be withdrawn.

With respect to dependent claim 6, the claim recites “receiving request for information about the first link” and “in response to the request, using the first anchor point when retrieving the information”. The Examiner contends that this is disclosed by *Cleraux* at col. 5, ll. 44-65. However, this passage discloses using an NFS (network file system) protocol and use of an emulation library, if, for example, the information is for a UNIX file and the filesystem is a Win32 filesystem. The first anchor point in claim 6 is an anchor point of an object in a data structure, such as an anchor point to a parent directory. The NFS protocol and emulation library are not anchor points for objects or links to the objects. Therefore claim 6 is patentable over *Cleraux* and Applicant respectfully requests that the rejection be withdrawn.

Similarly with respect to dependent claim 7, the claim recites “receiving a request for information about the object” and “selecting the first anchor point instead of the second anchor point to respond to the request.” Again the Examiner points to *Cleraux* at col. 5, ll. 44-65. As set forth above, this passage discloses using an NFS (network file system) protocol and use of an emulation library. The first anchor point and second anchor point in claim 7 are anchor points of an object in a data structure, such as anchor points to parent directories. The NFS

protocol and emulation library are not anchor points for objects or links to the objects. Therefore claim 7 is also patentable over *Cleraux* and Applicant respectfully requests that the rejection be withdrawn.

Remaining dependent claims 2-5 and 28-31 depend from amended independent claim 1 and are allowable for at least the same reasons set forth above. Furthermore, these dependent claims recite unique combinations of elements not disclosed or suggested by *Cleraux*.

### **Conclusion**

Applicant has made a bona fide effort to respond to each and every requirement set forth in the Office Action. In view of the foregoing amendments to the claims and remarks given herein, Applicant respectfully believes this case is in condition for allowance and respectfully requests allowance of the pending claims. If the Examiner believes any detailed language of the claims requires further discussion, the Examiner is respectfully asked to telephone the undersigned attorney so that the matter may be promptly resolved. The Examiner's prompt attention to this matter is appreciated.

Applicant is of the opinion that no additional fee is due as a result of this Amendment. Payment of all charges due for this filing is made on the attached Electronic Fee Sheet. If any additional charges or credits are necessary to complete this communication, please apply them to Deposit Account No. 23-3000.

Respectfully submitted,

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Date

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